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*Attorneys for Plaintiffs; additional counsel listed in
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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

CHASOM BROWN, WILLIAM BYATT,
JEREMY DAVIS, CHRISTOPHER CASTILLO,
and MONIQUE TRUJILLO individually and on
behalf of all other similarly situated,

Plaintiffs,

v.

GOOGLE LLC,

Defendant.

**QUINN EMANUEL URQUHART &
SULLIVAN, LLP**

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Case No.: 4:20-cv-03664-YGR-SVK

**JOINT STIPULATION AND
~~PROPOSED~~ ORDER TO MODIFY
PRETRIAL DEADLINES**

Judge: Hon. Yvonne Gonzalez Rogers

Trial Date: January 29, 2024

Pursuant to Civil Local Rules 6-2 and 7-12, this joint stipulation is entered into between Plaintiffs and Google LLC (“Google”), collectively referred to as the “Parties.”

WHEREAS, on March 2, 2023, the Court issued its Case Management and Pretrial Order, which set trial for November 6, 2023. Dkt. 885.

WHEREAS, on September 7, 2023, the Court rescheduled trial to begin January 29, 2024. Dkt. 989.

WHEREAS, the Parties are currently scheduled to mediate this dispute on September 29, 2023.

WHEREAS, on September 11, 2023, in consideration of the revised trial date and upcoming mediation, the Parties reached agreement to modify certain pretrial deadlines.

NOW, THEREFORE, the Parties stipulate to the following deadlines:

Date	Event
September 28, 2023	Google’s Opposition to Plaintiffs’ Daubert Motion re: On Amir
October 6, 2023	Joint Statement Confirming Parties’ Review of and Compliance with the Court’s Pretrial Setting Instructions
October 6, 2023	Opposition to Plaintiffs’ Motion to Exclude Google Witnesses
October 11, 2023	Plaintiffs’ Reply in support of Plaintiffs’ Daubert Motion re: On Amir
October 13, 2023	Deadline to Meet and Confer in Advance of Pretrial Conference
October 13, 2023, at 9:00 am	Compliance Deadline - to confirm counsel have reviewed the Court’s Pretrial Setting Instructions and are in compliance therewith.
October 17, 2023	File unresolved Motions <i>in Limine</i> and Oppositions
October 17, 2023	File Joint Pretrial Conference Statement
October 20, 2023	Pre-Trial Binders with ECF headers to Court
October 20, 2032	Plaintiffs’ Reply in support of Plaintiffs’ Motion to Exclude Google Witnesses
November 3, 2023, at 9:00 am	Pre-Trial Conference; Hearing on Daubert Motion(s) and Plaintiffs’ Motion to Exclude Google Witnesses

Dated: September 13, 2023

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/s/ Andrew H. Schapiro

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Attorneys for Defendant Google LLC

ATTESTATION OF CONCURRENCE

I am the ECF user whose ID and password are being used to file JOINT STIPULATION AND [PROPOSED] ORDER TO MODIFY PRETRIAL DEADLINES. Pursuant to Civil L.R. 5-1(i)(3), I hereby attest that each of the signatories identified above has concurred in the filing of this document.

Dated: September 18, 2023

By /s/ Mark C. Mao

Mark C. Mao


Counsel on behalf of Plaintiffs

[PROPOSED] ORDER

Pursuant to stipulation of the Parties, the Court hereby **ORDERS** the following pretrial dates be set:

Date	Event
September 28, 2023	Google's Opposition to Plaintiffs' Daubert Motion re: On Amir
October 6, 2023	Joint Statement Confirming Parties' Review of and Compliance with the Court's Pretrial Setting Instructions
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October 17, 2023	File unresolved Motions <i>in Limine</i> and Oppositions
October 17, 2023	File Joint Pretrial Conference Statement
October 20, 2023	Pre-Trial Binders with ECF headers to Court
October 20, 2032	Plaintiffs' Reply in support of Plaintiffs' Motion to Exclude Google Witnesses
November 15, 2023, at 9:00 am	In light of the Court's trial schedule, the Court sets the Pre-Trial Conference; Hearing on Daubert Motion(s) and Plaintiffs' Motion to Exclude Google Witnesses

DATED: September 18, 2023


 HON. YVONNE GONZALEZ ROGERS
 United States District Judge